

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|----------------------|---|-----------------------------|
| In re: | : | |
| PATRICIA L. HAMILTON | : | Chapter 7 |
| | : | |
| Debtor | : | Bankruptcy No. 19-13322 PMM |
| | : | |
| PATRICIA L. HAMILTON | : | Adversary No. 23-41 |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | |
| | : | |
| PORTFOLIO RECOVERY | : | |
| ASSOCIATES, LLC | : | |
| | : | |
| Defendant | : | |

MOTION FOR ENTRY OF DEFAULT JUDGMENT

Patricia L. Hamilton, the above Plaintiff, by and through her attorney, David S. Gellert, Esquire, of David S. Gellert, P.C., files a Motion for Entry of Default Judgment and in support thereof states the following:

1. On May 16, 2023, the Plaintiff filed an Adversary proceeding against Portfolio Recovery Associates, LLC, docketed to the above Adversary number.
2. On May 17, 2023, service of the Complaint and Summons were made upon the Defendant by certified mail, return receipt requested, and a Certificate of Service has been filed to evidence such service.
3. The Summons set forth June 16, 2023 as the Answer Date for the Defendant.
4. The Defendant has not filed an answer to the Complaint within the time period provided.

WHEREFORE, Plaintiff requests that Judgment by Default be entered in favor of the Plaintiff and against the Defendant, Portfolio Recovery Associates, LLC, and that this Court enter the Order attached to the Plaintiff's Complaint granting the relief requested by Plaintiff in her Complaint.

Respectfully submitted,

Dated: June 29, 2023

s/ David S. Gellert
David S. Gellert, Esquire
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